

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	No: 20-00448
DIANE C. KRAUSE	:	
	:	
Debtor	:	Chapter 13
	:	
U.S. BANK NATIONAL ASSOCIATION, NOT	:	
INDIVIDUALLY BUT SOLELY AS TRUSTEE	:	
FOR BLUEWATER INVESTMENT TRUST	:	
2018-1	:	
Movant	:	
	:	
V.	:	
	:	
DIANE C. KRAUSE	:	
	:	
Respondent	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

AND NOW comes Debtor, by her attorney, Steven M. Carr, Esquire, 119 East Market Street, York, PA 17401, and files this Answer, of which the following is a statement:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied.
9. Denied as stated. Debtor admits that she is behind but intends to cure. Debtor has also paid \$910.00 that has not been credited.
10. Denied.
11. Denied. Debtor will cure the default, thereby adequately protecting Movant.

- 12. Denied.
- 13. Denied.
- 14. Denied.

WHEREFORE, Debtor prays that the Motion be dismissed.

Respectfully submitted,

Ream Carr Markey Woloshin & Hunter LLP

/s/Steven M. Carr
STEVEN M. CARR, ESQUIRE
Attorney for Debtors
119 East Market Street
York, PA 17401
(717) 843-8968
Sup. Ct. I.D. #34336

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	No: 20-00448-HWV
DIANE C. KRAUSE	:	
	:	
Debtor	:	Chapter 13
	:	
U.S. BANK NATIONAL ASSOCIATION, NOT	:	
INDIVIDUALLY BUT SOLELY AS TRUSTEE	:	
FOR BLUEWATER INVESTMENT TRUST	:	
2018-1	:	
Movant	:	
	:	
V.	:	
	:	
DIANE C. KRAUSE	:	
	:	
Respondent	:	

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing Motion, Notice, Order and Certificate of Service with the Clerk of the Bankruptcy Court using the CM/ECF system which sent notification of such filing to the following Filing Users at the following addresses:

William E. Craig on behalf of Creditor Santander Consumer USA Inc.
ecfmail@mortoncraig.com, mortoncraigecf@gmail.com

Charles J. DeHart, III (Trustee)
Twecf@pamd13trustee.com

Daniel Philip Jones on behalf of Creditor U.S. Bank National Association, not individually but solely as Trustee for BlueWater Investment Trust 2018-1
djones@sterneisenberg.com, bkecf@sterneisenberg.com

United States Trustee
ustpreion03.ha.ecf@usdoj.gov

James Warmbrodt on behalf of Creditor U.S. Bank National Association, not individually but solely as Trustee for BlueWater Investment Trust 2018-1
bkgroup@kmlawgroup.com

Peter Wapner on behalf of Creditor U.S. Bank National Association, not individually but solely as Trustee for BlueWater Investment Trust 2018-1
peter.wapner@phelanhallinan.com

and I hereby certify that I have mailed by United States Postal Service the Notice to the following non-CM/ECF participants at the following addresses:

None.

Ream, Carr, Markey, Woloshin & Hunter, LLP

/s/ Steven M. Carr

Steven M. Carr, Esquire

Attorney for Debtor

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York, PA 17401

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I.D. #34336